

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION**

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UNITED STATES OF AMERICA and  
COMMONWEALTH OF VIRGINIA

Plaintiffs,

v.

FRAZIER T. BOYD III and BOYD  
FARM LLC,

Defendants.

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Civil Action No. 3:25-cv-00021-JHY-JCH

**PLAINTIFFS' NOTICE OF  
LODGING OF CONSENT DECREE**

Plaintiffs the United States of America (“United States”) and the Commonwealth of Virginia, by and through the Virginia Department of Environmental Protection (“the Commonwealth”), hereby notify the Court that they are lodging a proposed Consent Decree which, if approved, would resolve all of the claims asserted by Plaintiffs in this litigation.

Plaintiffs respectfully request that the Court withhold consideration of the proposed Consent Decree while the United States provides an opportunity for public comment pursuant to 28 C.F.R. § 50.7. The Department of Justice will publish a notice in the Federal Register stating that the Decree has been lodged with the Court. The notice will solicit public comment for a period of 30 days.

During the comment period described above, no action is required of the Court as to the proposed Consent Decree. After the comment period has closed, the United States will evaluate

any comments it receives and advise the Court as to whether the Plaintiffs request that the Court enter the proposed Consent Decree.

DATED: April 15, 2025

Respectfully submitted,

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Environment & Natural Resources Division

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was electronically filed with the Clerk of the Court on April 15, 2025, using the Court's electronic filing system, which will send notification of said filing to the attorneys of record that have, as required, registered with the Court's system.

/s/ *Laura J. Brown*  
Laura J. Brown